

Sage Legal LLC

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October 16, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Shkolir, et al. v. Rx2Go, Inc., et ano.

Case No.: 1:23-cv-7256 (OEM) (PK)

Dear Judge Kuo:

This firm represents the Defendants in the above-referenced case, who write to respectfully request a thirty (30) day extension of time to respond to Plaintiffs' second amended complaint dated October 1, 2024. See ECF Docket Entry [43](#).

Pursuant to ¶ IV(B) of this Court's Individual Practice Rules, Defendants respectfully submit that:

(i) the deadline to submit response to the complaint falls on Tuesday, October 15, 2024 pursuant to Rule 15 of the Federal Rules of Civil Procedure (hereinafter referred to as "Rules" or "Rule") for Defendants Rx2Go, Inc. and Erkin Sattarov,¹ and there is currently no deadline for Victoria NYC I, Inc. ("Victoria") to respond to the complaint as it has not yet been served upon Victoria;

(ii) the reason for the request is because your undersigned was preparing for a trial last week scheduled to proceed on Friday, October 11, 2024 which got adjourned in the afternoon on Thursday, October 10, 2024 and due to other deadlines and appearances;

(iii) there have been no previous requests for an extension of this deadline;

(iv) Plaintiffs consent to this request on the condition that Defendants accept service of the complaint upon Victoria and waive any defenses related to service of process, which Defendants so confirm herein; and

(v) the requested extension should not affect any other scheduled dates or deadlines.

Based on the foregoing, Defendants respectfully submit that there exists good cause such that this Court should exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). Defendants thank this honorable Court for its time and attention to this case.

¹ See Fed. R. Civ. P. 15(a)(3).

Dated: Jamaica, New York
October 16, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
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